

## Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	OSFI	AI #:	100660	TEMPO Activity No:	PER20060001
Facility Name:	South Yard	Remarks Submitted by:	URS - Michael J. Hebert & Kerry Brouillette, (225-922-5700) on behalf of: OSFI - Thomas Ervin, Health, Safety & Compliance Officer Office (985) 868-1438 Ext. 373, Cell (985) 637-0644 Email <a href="mailto:tervin@osfi-fw.com">tervin@osfi-fw.com</a>		
Permit Writer:	Traci Green	Permit Writer Email address:	225.219.3009 <a href="mailto:Traci.green@la.gov">Traci.green@la.gov</a>		

### Instructions

**Permit Reference** – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

**Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

**DEQ Response** – **DO NOT COMPLETE THIS SECTION.** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air inventory report.PDF	It appears that there is a formatting error in the document that cuts off some of the contact information for Mr. Thomas Ervin, so it cannot be confirmed correct.	Formatting corrected.

## Worksheet for Technical Review of Working Draft of Proposed Permit

<b>Company Name:</b>	<b>OSFI</b>	<b>AI #:</b>	<b>100660</b>	<b>TEMPO Activity No:</b>	<b>PER20060001</b>
<b>Facility Name:</b>	<b>South Yard</b>	<b>Remarks Submitted by:</b>	URS - Michael J. Hebert & Kerry Brouillette, (225-922-5700) on behalf of: OSFI - Thomas Ervin, Health, Safety & Compliance Officer Office (985) 868-1438 Ext. 373, Cell (985) 637-0644 Email tervin@osfi-fw.com		
<b>Permit Writer:</b>	<b>Traci Green</b>	<b>Permit Writer Email address:</b>	225.219.3009 Traci.green@la.gov		

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Specific Requirements.pdf	p. 2, EQT-01, Diesel ICE Cap: IC engine testing requirements were added to the draft permit, specifically, items 6 – 12, citing LAC 33:III.501.C.6 as the basis. The South Yard emission rates were conservatively based on the North Yard calculations. However, no IC engines are operated at the South Yard >= 500 Hp. OSFI proposes to replace the existing engine testing requirements with a restriction that stationary IC engines >= 500 Hp shall not be used at the South Yard facility.	Stack testing requirements removed from EQT-01. Specific condition added to state the following: Stationary IC engines >= 500 Hp shall not be used at the South Yard facility.
Permit package	The current draft permit includes the following corrections to the prior version of the draft permit, already reviewed with LDEQ: HAP-LTAP emissions from the EQT-01 ICE Diesel Engines Cap = 0.08 TPY, reduced from 0.14 TPY after removing the inclusion of 2 non-HAP-LTAP VOCs, propylene and phenanthrene In the letter header, a correction of the text for "RE." is suggested - delete first occurrence of "Houma" for clarity Section VIII: capacity for last tank in table needs to be changed from 5,238 to 2,538 gal. - looks like a typo.	Complete
Permit Letter 100660.rtf		First occurrence of "Houma" removed from the letter header.
Permit Letter 100660.rtf		Typo corrected.

**AIR PERMIT BRIEFING SHEET  
AIR PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Offshore Specialty Fabricators Inc - South Yard  
Agency Interest No.: 100660  
Offshore Specialty Fabricators Inc  
Houma, Terrebonne Parish, Louisiana**

**I. BACKGROUND**

Offshore Specialty Fabricators Inc - South Yard, is an existing offshore oil drilling platform reclamation/salvage facility. This is an initial permit for the facility.

**II. ORIGIN**

A permit application and Emission Inventory Questionnaire (EIQ) dated June 14, 2006 were received requesting a permit. Additional information dated November 28, 2006 was also received.

**III. DESCRIPTION**

Offshore Specialty Fabricators Inc, South Yard is an offshore oil drilling platform reclamation/salvage facility located in an industrial area of Houma. The South Yard activities related to the salvaging and recycling of offshore exploration and production structures normally include metal cutting, the use of diesel-fueled internal combustion engines and associated fuel, waste oil storage, and asbestos removal conducted by certified contractors.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Emissions
PM <sub>10</sub>	21.14
SO <sub>2</sub>	6.16
NO <sub>x</sub>	93.01
CO	20.05
VOC <sup>1</sup>	7.54

**AIR PERMIT BRIEFING SHEET  
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Offshore Specialty Fabricators Inc  
Houma, Terrebonne Parish, Louisiana**

<sup>1</sup>VOC speciation in tons per year:

VOC LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons Per Year	Non-VOC LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons Per Year
Acetaldehyde	0.02	Asbestos	<0.01
Acrolein	<0.01	Chromium IV (and Compounds)	0.01
Benzene	0.02	Manganese (and Compounds)	0.02
Formaldehyde	0.02	Nickel (and Compounds)	0.01
Naphthalene	<0.01	<b>Total Non-VOC TAPS</b>	0.05
Toluene	0.01		
Xylene	0.01		
<b>Total VOC TAP's</b>	0.10		
<b>Other VOC</b>	7.44		
<b>Total VOC</b>	7.54		

**IV. TYPE OF REVIEW**

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of LAC 33:III. Chapter 51 Toxic Air Pollutants (TAPs).

**V. PUBLIC NOTICE**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <Date>; and in *The Courier*, on <Date>. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <Date>. All documents will be considered prior to issuance of the permit.

**AIR PERMIT BRIEFING SHEET  
AIR PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Offshore Specialty Fabricators Inc - South Yard  
Agency Interest No.: 100660  
Offshore Specialty Fabricators Inc  
Houma, Terrebonne Parish, Louisiana**

**VI. EFFECTS ON AMBIENT AIR**

None

**VII. GENERAL CONDITION XVII ACTIVITIES**

None

**VIII. INSIGNIFICANT ACTIVITIES**

Description	Citation
1,081 gallon Diesel above ground Storage Tank	LAC 33:III.501.B.5.A.3
3,159 gallon Diesel AST Tank	LAC 33:III.501.B.5.A.3
4,442 gallon Waste Oil AST Tank	LAC 33:III.501.B.5.A.3
2,538 gallon Waste Oil Tank	LAC 33:III.501.B.5.A.3
Emissions from Hydrotesting	LAC 33:III.501.B.1.B.3

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated June 14, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
- A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.
- The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
- This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
  2. Report by September 30 to cover April through June
  3. Report by December 31 to cover July through September
  4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

D. Each report submitted in accordance with this condition shall contain the following information:

1. Description of noncomplying emission(s);
2. Cause of noncompliance;
3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.

E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

**General Information**

**AI ID: 100660 Offshore Specialty Fabricators Inc - South Yard**  
**Activity Number: PER20060001**  
**Permit Number: 2880-00374-00**  
**Air - Minor Source/Small Source Initial**

ID	Name	User Group	Start Date
2880-00374	Offshore Specialty Fabricators Inc - South Yard	CDS Number	10-19-2006
72-1166205	Federal Tax ID	Federal Tax ID	11-21-1999
LAD985222496	Offshore Specialty Fabricators Inc	Hazardous Waste Notification	05-09-2005
LAU003969	LPDES #	LPDES Permit #	05-28-2003
WP4417	LWDPS #	LWDPS Permit #	06-25-2003
14531	Global Pipelines Plus Inc	TEMPO Merge	10-05-2003

**Physical Location:** 115 Gulf Access Rd  
Houma, LA 70361  
**Main Phone:** 9858681438 or 8002564695

**Mailing Address:** PO Box 1420  
Houma, LA 703611420

**Location of Front Gate:** 29° 32' 32" latitude, 90° 42' 58" longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD83

**Related People:**

Name	Mailing Address	Phone (Type)	Relationship
Todd Albert	PO Box 1420 Houma, LA 703611420		Responsible Official for
Thomas Ervin	PO Box 1420 Houma, LA 703611420	tervin@osfi-fw.com (	Haz. Waste Billing Party for
Thomas Ervin	PO Box 1420 Houma, LA 703611420	9858681438 (WP)	Haz. Waste Billing Party for

**Related Organizations:**

Name	Address	Phone (Type)	Relationship
Offshore Specialty Fabricators Inc	115 Menard Rd Houma, LA 70361	9858680711 (WF)	Owns
Offshore Specialty Fabricators Inc	115 Menard Rd Houma, LA 70361	9858681438 (WP)	Owns
Offshore Specialty Fabricators Inc	115 Menard Rd Houma, LA 70361	9858680711 (WF)	Operates
Offshore Specialty Fabricators Inc	115 Menard Rd Houma, LA 70361	9858681438 (WP)	Operates
Offshore Specialty Fabricators Inc	115 Menard Rd Houma, LA 70361	9858680711 (WF)	Air Billing Party for
Offshore Specialty Fabricators Inc	115 Menard Rd Houma, LA 70361	9858681438 (WP)	Air Billing Party for

**SIC Codes:** 1389, Oil and gas field services, nec

**Note:** This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

**INVENTORIES**

AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard  
 Activity Number: PER20060001  
 Permit Number: 2880-00374-00  
 Air - Minor Source/Small Source Initial

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate (other units)	Normal Operating Rate (other units)	Contents	Operating Time
EQT001	EQT01 Diesel ICE CAP				6 MMHp-hrs/yr	4200 hr/yr (All Year)
FUG001	FUG01 Metal Cutting Fugitive Emissions		.24 MM ft <sup>3</sup> /yr	.24 MM ft <sup>3</sup> /yr	Welding and Cutting Fuel Consumption Rate	4200 hr/yr (All Year)
FUG002	FUG02 Road Emissions		8617 vehicle miles traveled/yr	8617 vehicle miles traveled/yr		4200 hr/yr (All Year)
FUG003	FUG03 Asbestos Removal Emissions		(other units)	(other units)	10,000 lb asbestos removed/yr	4200 hr/yr (All Year)
FUG004	FUG04 Welding Fumes		1150 lb/yr	1150 lb/yr	Welding Rods Used	4200 hr/yr (All Year)

**Subject Item Groups:**

ID	Description	Included Components (from Above)
GRP001		EQT1 EQT01 Diesel ICE CAP
GRP001		FUG1 FUG01 Metal Cutting Fugitive Emissions
GRP001		FUG2 FUG02 Road Emissions
GRP001		FUG3 FUG03 Asbestos Removal Emissions
GRP001		FUG4 FUG04 Welding Fumes

**Relationships:**

**Stack Information:**

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)

**Fee Information:**

Subj Item Id	Multiplier	Units Of Measure	Fee Desc
GRP001			1280 - Ship and Boat Building: D) 201 to 1000 Employees

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard  
 Activity Number: PER20060001  
 Permit Number: 2880-00374-00  
 Air - Minor Source/Small Source Initial

**All phases**

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 001	3.14	3.14	6.60	2.93	2.93	6.15	44.29	44.29	93.00	9.54	9.54	20.04	3.59	3.59	7.54
EQT01															
FUG 001	1.04	1.04	2.19	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01			
FUG01															
FUG 002	5.86	5.86	12.30												
FUG02															
FUG 003	<	0.01	<	0.01	0.01	0.01									
FUG03															
FUG 004	0.02	0.02	0.05												
FUG04															

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

**Permit Phase Totals:**

PM10: 21.14 tons/yr  
 SO2: 6.16 tons/yr  
 NOx: 93.01 tons/yr  
 CO: 20.05 tons/yr  
 VOC: 7.54 tons/yr

**Emission rates Notes:**

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard

Activity Number: PER20060001

Permit Number: 2880-00374-00

Air - Minor Source/Small Source Initial

**All phases**

Subject Item	Acetaldehyde			Acrolein			Asbestos			Benzene			Chromium VI (and compounds)		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 001 EQT01	0.01	0.01	0.02	< 0.01	< 0.01	< 0.01				0.01	0.01	0.02			
FUG 001 FUG01															
FUG 003 FUG03							< 0.01	< 0.01	< 0.01						
FUG 004 FUG04													< 0.01	< 0.01	0.01

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard

Activity Number: PER20060001

Permit Number: 2880-00374-00

Air - Minor Source/Small Source Initial

**All phases**

Subject Item	Formaldehyde			Manganese (and compounds)			Naphthalene			Nickel (and compounds)			Toluene		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 001 EQT01	0.01	0.01	0.02				< 0.01	< 0.01	< 0.01				< 0.01	< 0.01	< 0.01
FUG 001 FUG01				< 0.01	< 0.01	0.01									
FUG 003 FUG03															
FUG 004 FUG04				< 0.01	< 0.01	0.01				< 0.01	< 0.01	0.01			

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard

Activity Number: PER20060001

Permit Number: 2880-00374-00

Air - Minor Source/Small Source Initial

**All phases**

Subject Item	Xylene (mixed isomers)		
	Avg lb/hr	Max lb/hr	Tons/Year
EQT 001 EQT01	< 0.01	< 0.01	< 0.01
FUG 001 FUG01			
FUG 003 FUG03			
FUG 004 FUG04			

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

**Permit Parameter Totals:**

Acetaldehyde: 0.02 tons/yr

Acrolein: <0.01 tons/yr

Asbestos: <0.01 tons/yr

Benzene: 0.02 tons/yr

Chromium VI (and compounds): 0.01 tons/yr

Formaldehyde: 0.02 tons/yr

Manganese (and compounds): 0.02 tons/yr

Naphthalene: <0.01 tons/yr

Nickel (and compounds): 0.01 tons/yr

Toluene: <0.01 tons/yr

Xylene (mixed isomers): <0.01 tons/yr

**Emission Rates Notes:**

**SPECIFIC REQUIREMENTS**

**AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard**

**Activity Number: PER20060001**

**Permit Number: 2880-00374-00**

**Air - Minor Source/Small Source Initial**

**EQT001      EQT01 Diesel ICE CAP**

- 1 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year      Statistical Basis: Six-minute average
- 2 Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 3 Total combined operating rate  $\leq$  6MMHp-hrs/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the combined operating rate of the equipment exceeds the maximum listed in this specific condition for any 12 consecutive month period. [LAC 33:III.501.C.6]
- 4 Total combined operating rate recordkeeping by electronic or hard copy continuously. Keep records of combined operating rate for all equipment each day. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]
- 5 Total combined operating rate monitored by technically sound method daily. [LAC 33:III.501.C.6]
- 6 Stationary IC engines  $\geq$  500Hp, shall not be used at the South Yard Facility. [LAC 33:III.501.C.6]

**FUG001      FUG01 Metal Cutting Fugitive Emissions**

- 7 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7. [LAC 33:III.1305]
- 8 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year      Statistical Basis: Six-minute average

**FUG002      FUG02 Road Emissions**

- 9 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7. [LAC 33:III.1305]

**FUG003      FUG03 Asbestos Removal Emissions**

- 10 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7. [LAC 33:III.1305]
- 11 An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity. [LAC 33:III.5151.F.1.f]
- 12 Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]
- 13 Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M. [40 CFR 61.148]

**FUG004      FUG04 Welding Fumes**

**SPECIFIC REQUIREMENTS**

**AI ID: 100660 - Offshore Speciality Fabricators Inc - South Yard**

**Activity Number: PER20060001**

**Permit Number: 2880-00374-00**

**Air - Minor Source/Small Source Initial**

**FUG004 FUG04 Welding Fumes**

- 14 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7. [LAC 33:III.1305]
- 15 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year Statistical Basis: Six-minute average

**GRP001**

- 16 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1103]
- 17 Outdoor burning of waste material or other combustible material is prohibited. [LAC 33:III.1109.B]
- 18 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]
- 19 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 20 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]
- 21 Carbon monoxide  $\leq$  20.05 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 22 Nitrogen oxides  $\leq$  93.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 23 Particulate matter (10 microns or less)  $\leq$  21.14 tons/yr. [LAC 33:III.501.C.6]
- 24 Sulfur dioxide  $\leq$  6.16 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 25 VOC, Total  $\leq$  7.54 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 26 Acetaldehyde  $\leq$  0.02 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 27 Acrolein  $<$  0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 28 Asbestos  $<$  0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 29 Benzene  $\leq$  0.02 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 30 Chromium VI (and compounds)  $\leq$  0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 31 Formaldehyde  $\leq$  0.02 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum

**SPECIFIC REQUIREMENTS**

AI ID: 100660 - Offshore Specialty Fabricators Inc - South Yard

Activity Number: PER20060001

Permit Number: 2880-00374-00

Air - Minor Source/Small Source Initial

**GRP001**

- 32 Manganese  $\leq 0.02$  tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 33 Naphthalene  $< 0.01$  tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 34 Toluene  $< 0.01$  tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 35 Xylene (mixed isomers)  $< 0.01$  tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 36 Manganese (and compounds)  $\leq 0.02$  tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 37 Nickel (and compounds)  $\leq 0.01$  tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum